

UNITED STATES DISTRICT COURT  
Southern District of New York

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:

OLD TOLEDO BRANDS, INC.,

:

Plaintiff, : 07 Civ. 9496 (VM) (GWG)

:

-against-

: NOTICE OF MOTION  
SCHENKER, INC., d/b/a TO ADMIT ATTORNEY  
Sea Cargo International, : PRO HAC VICE

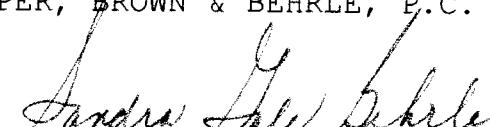
Defendant. :

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**PLEASE TAKE NOTICE**, that upon the annexed Affirmation in Support of Motion to Admit Attorney Pro Hac Vice of Sandra Gale Behrle, dated November 5, 2007, the Affirmation of Brendan Collins, dated November 2, 2007, and the Certificate of the United States District Court for the District of Columbia, plaintiff Old Toledo Brands, Inc., by its attorneys Cooper, Brown & Behrle, P.C., will move this Court for an Order pursuant to Local Civil Rule 1.3(c) admitting Brendan Collins, Esq., as attorney, pro hac vice.

Dated: New York, New York  
November 14, 2007

COOPER, BROWN & BEHRLE, P.C.

By:   
Sandra Gale Behrle (4652)  
Attorneys for Plaintiff  
331 Madison Avenue, 2nd Floor  
New York, New York 10017  
Telephone: (212) 957-9000

TO:

John T. Lillis, Esq.  
Kennedy Lillis Schmidt & English  
75 Maiden Lane, Suite 402  
New York, New York 10038-4816

UNITED STATES DISTRICT COURT  
Southern District of New York

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OLD TOLEDO BRANDS, INC.,

:

Plaintiff, : 07 Civ. 9496 (VM) (GWG)

:

-against- : **AFFIRMATION IN SUPPORT  
OF MOTION TO ADMIT  
PRO HAC VICE**

SCHENKER, INC., d/b/a  
Sea Cargo International,

:

Defendant. :

- - - - - x

Sandra Gale Behrle, an attorney admitted to practice before the courts of the State of New York, affirms under penalties of perjury and states:

1. I am an officer of Cooper, Brown & Behrle, P.C., attorneys of record for Plaintiff. I am attorney admitted to practice before the Courts of this state since June 1974, First Department.

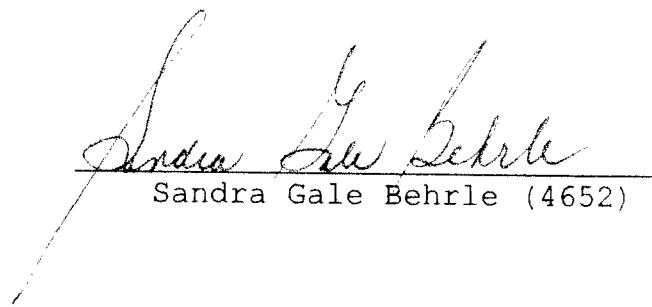
2. I make this motion on my own knowledge for an Order admitting my colleague, Brendan Collins, Esq., to appear as attorney for plaintiff in the above-captioned action, pro hac vice.

3. As shown by the accompanying Affirmation of attorney Collins, he is a member in good standing before the Bars of the District of Columbia and the District of Maryland.

4. I will continue my appearance as co-counsel for plaintiff in this matter.

**WHEREFORE**, movant respectfully requests an Order of this Court admitting Brendan Collins, Esq., to practice before this Court, pro hac vice.

Dated: New York, New York  
November 5, 2007



Sandra Gale Behrle (4652)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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OLD TOLEDO BRANDS, INC.,	:	
	Plaintiff,	Civil Action No. <u>07 Civ. 9496</u>
 v.		
SCHENKER, INC.,	:	<u>AFFIRMATION</u>
d/b/a Sea Cargo International,	:	
 Defendant.		

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Brendan Collins affirms and states:

1. I am a partner in the law firm of Galland Kharasch Greenberg Fellman & Swirsky, PC, attorneys for plaintiff Old Toledo Brands, Inc. in the above-referenced litigation. I make this affirmation to support the motion for my admission *pro hac vice*.
2. The law firm of Galland Kharasch Greenberg Fellman & Swirsky, PC, whose principal place of business is 1054 Thirty-First Street, NW, Washington, DC, 20007, has a local, regional and international practice and is regular counsel to plaintiff Old Toledo Brands, Inc.
3. I am a graduate of George Washington University School of Law. I am a member of the Maryland Bar (admitted 1986) and the District of Columbia Bar (#413658, admitted 1988). I am admitted to the following courts: U.S.D.C. for the District of Columbia (admitted 08/05/91), U.S.D.C. for the District of Maryland (Southern District) (Fed. Bar No. 17065, admitted 07/09/07), 5th Circuit Court of Appeals (admitted 12/18/98), and 10th Circuit Court of Appeals (admitted 09/09/97). There are no disciplinary proceedings filed or pending against me in any jurisdiction. Attached hereto is a certificate issued by the Clerk of the United States District Court for the District

of Columbia certifying that I am a member of that Bar in good standing.

4. Based on the foregoing, it is respectfully requested that the Court permit my *pro hac vice* admission.

Dated: November 2, 2007



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Brendan Collins  
GALLAND KHARASCH GREENBERG  
FELLMAN & SWIRSKY, PC  
1054 Thirty-First Street, NW  
Washington, DC 20007  
Telephone: 202/342-5200  
Facsimile: 202/342-5219  
Email: [bcollins@gklaw.com](mailto:bcollins@gklaw.com)

Counsel for Plaintiff  
OLD TOLEDO BRANDS, INC.

United States District Court  
for the District of Columbia  
CLERK'S OFFICE  
333 Constitution Avenue, NW  
Washington, DC 20001

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I, NANCY M. MAYER-WHITTINGTON, Clerk of the United States

District Court for the District of Columbia, do hereby certify that:

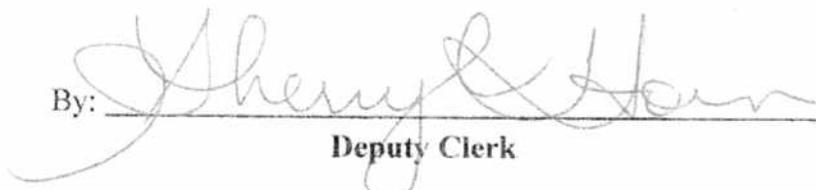
BRENDAN COLLINS

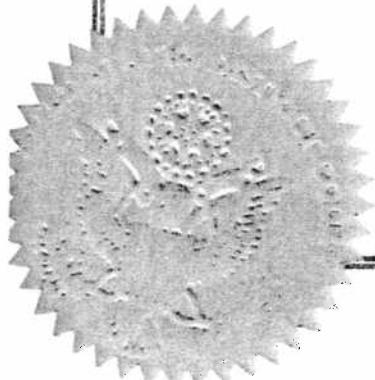
was, on the 5<sup>th</sup> day of August A.D. 1991 admitted to practice as an Attorney at Law at the Bar of this Court, and is, according to the records of this Court, a member of said Bar in good standing.

In Testimony Whereof, I hereunto subscribe my name and affix the seal of said Court in the City of Washington this 25th day of October A.D. 2007.

NANCY M. MAYER-WHITTINGTON, CLERK

By: \_\_\_\_\_

  
Deputy Clerk



UNITED STATES DISTRICT COURT  
Southern District of New York

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OLD TOLEDO BRANDS, INC.,

:

Plaintiff,

07 Civ. 9496 (VM) (GWG)

:

-against-

**ORDER ADMITTING  
ATTORNEY PRO HAC VICE**

SCHENKER, INC., d/b/a

Sea Cargo International,

:

Defendant. :

- - - - - x

**UPON** the reading and filing of the Affirmation in Support of Motion to Admit Attorney Pro Hac Vice of Sandra Gale Behrle, dated November 5, 2007, the Affirmation of Brendan Collins, dated November 2, 2007, and the filing of the Certificate of Good Standing of Brendan Collins from the District of Columbia Court of Appeals, dated October 25, 2007, it is hereby

**ORDERED**, that Brendan Collins, a member in good standing of the Bars of the District of Columbia and District of Maryland, be and hereby is admitted to this Court, pro hac vice, pursuant to Local Civil Rule 1.3(c).

Dated: New York, New York  
November , 2007

E N T E R:

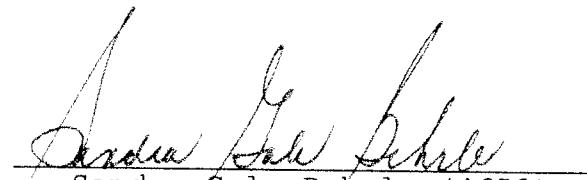
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United States District Judge

**Certificate of Service**

I hereby certify that on the 14th day of November, 2007, I caused to be mailed a true copy of the within Notice of Motion to Admit Attorney Pro Hac Vice, via first class mail, addressed as follows:

John T. Lillis, Esq.  
Kennedy Lillis Schmidt & English  
Attorneys for Defendant  
75 Maiden Lane, Suite 402  
New York, New York 10038-4816

  
\_\_\_\_\_  
Sandra Gale Behrle (4652)